

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR DISTRICT OF MARYLAND**

IN RE: Zoe Artis

\* CASE No: 09-25699

\* CHAPTER 13

Debtor

\* \* \* \* \*

**AMENDED MOTION TO WITHDRAW APPEARANCE OF ADAM M .  
FREIMAN, ESQUIRE AS COUNSEL FOR THE DEBTOR PURSUANT TO  
LOCAL RULE 9010-4(a)(2)**

NOW COMES Debtor's under-signed counsel, and in pursuit of an order withdrawing the appearance of counsel as attorney for the Debtor, states as follows:

1. The Debtor has failed to cooperate with this office and communicate necessary information, thereby making further representation of her in this case impossible.
2. The Debtor has also treated the staff of this firm in a manner which has so damaged the attorney-client relationship as to make effective representation impossible.
3. Counsel has advised the Debtor of the importance of retaining new counsel in this matter, and to notify the clerk of the court if she should choose to represent herself, and of his intention to withdraw as counsel of record more than five days prior to the filing of this motion by first class mail, postage pre-paid.
4. Counsel has refunded the unused portion of the retainer per the attached time sheet as of the date of the letter stating Counsel's intent to withdraw.. (Exhibit "A") Counsel notes his firm's continued representation of the Debtor including today's Motion for Relief hearing, pending the granting of the instant Motion.

WHEREFORE, the undersigned counsel respectfully requests that this Honorable Court withdraw the appearance of Adam M. Freiman, Esquire as attorney of record for the Debtor in this Chapter 13 case.

Respectfully submitted,

Dated: December 7, 2009

\_\_\_\_\_  
/s/  
Adam M. Freiman, #23047

1777 Reisterstown Road, Suite 360  
Baltimore, MD 21208  
(410) 415-0445  
Counsel for the Debtor

CERTIFICATE OF SERVICE

1) I HEREBY CERTIFY, that on this December 7, 2009, a copy of the foregoing *Motion To Withdraw Appearance Of Adam M. Freiman, Esquire, As Counsel For The Debtor Pursuant To Local Rule 9010-4(a)(2)* was delivered by first class mail, postage prepaid, to:

all creditors on the attached matrix taken from the Court's website and specifically to:

Zoe Artis  
906 Jackson Valley Court  
Bowie, MD 20721

and electronically

Office of the U.S. Trustee

Chapter 13 Trustee

2. I HEREBY CERTIFY, pursuant to Local Rule 9010-4(a)(2), that the name and last known address of the debtor are, respectively:

Zoe Artis  
906 Jackson Valley Court  
Bowie, MD 20721

3. I FURTHER CERTIFY that a written notice was mailed to the debtor on November 18, 2009, which was at least 5 days prior to the filing and service of this motion of counsel's proposed withdrawal, advising the debtor to have new counsel to represent her unless she intends to represent herself in the case, in which case to notify the clerk of her intentions.

\_\_\_\_\_/s/\_\_\_\_\_  
Adam M. Freiman, #23047